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September 30, 2022

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of July 27, 2022, ECF No. 8272, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's November 24, 2020 order, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs" or "PECs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

On September 9, 2022, Saudi Arabia circulated revised proposals for FBI redactions to Saudi Arabia's filings associated with the Court's November 25, 2019 and January 3, 2020 orders. On September 23, 2022, Saudi Arabia circulated revised proposals for FBI redactions to Saudi Arabia's filings associated with the Court's January 7, April 27, and May 7, 2020 orders and with Saudi Arabia's October 28, 2019 motion for a scheduling order. On September 29, 2022, Saudi Arabia circulated revised proposals for FBI redactions and modifications to redactions under the MDL Protective Order necessitated by those revisions. The revisions to FBI redactions propose removing redactions of materials that were publicly released pursuant to section 2 of Executive Order 14040.

Plaintiffs are continuing to review the redactions proposed by Saudi Arabia.

The FBI has reviewed the PECs' proposed redactions to their expert reports and provided responses on six of the seven PEC expert reports. Upon completion of its review of the final PEC expert report, the FBI will turn to the filings recently provided by KSA's counsel. However, the FBI requests that the PECs provide proposed redactions to any PEC filings associated with those KSA filings, so that the FBI can review proposed redactions to all briefing materials relevant to a particular order at the same time.

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Dallah Avco informed the parties that it takes no position on these proposed redactions.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before November 30, 2022.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)